

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

February 08, 2024

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXASBY: Fidel Morales
DEPUTYUnited States of America
vsDEFENDANT #1 Lyzette Yvonne GUERRERO
DEFENDANT #2 Karla ALCANTAR-Salazar
AKA: Karla Elizabeth SALAZAR

Case No.

EP:24-M-00592-MATDefendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 5, 2024 in the county of El Paso in the
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*Charge 1: 8 U.S.C.1324 (a)(1)(A)(v)(I),
(a)(1)(A)(ii) and (a)(1)(B)(i)knowingly, intentionally, and unlawfully conspired, combined, confederated, and
agreed together, and with others known and unknown, to commit offenses
against the United States, namely: knowing and in reckless disregard of the fact
that an alien has come to, entered, and remained in the United States in violation
of law, did transport, move, or attempt to transport and move such alien within the
United States by means of transportation and otherwise, in furtherance of said
violation of law.

This criminal complaint is based on these facts:

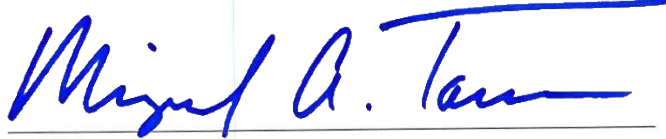
Charge #1: DEFENDANT #1 Lyzette Yvonne GUERRERO
Charge #1: DEFENDANT #2 Karla ALCANTAR-Salazar

Continued on the attached sheet.

Complaint sworn to telephonically on

February 08, 2024 at 02:00 PM and signed
electronically. **FED.R.CRIM.P. 4.1(b)(2)(A)**

Sworn to before me and signed in my presence.

Date: February 8, 2024City and state: El Paso, Texas
Complainant's signatureMatthew Miller, Border Patrol Agent
Printed name and title
Judge's signatureMiguel A. Torres, U.S. Magistrate Judge
Printed name and title

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

DEFENDANT #1 Lyzette Yvonne GUERRERO

DEFENDANT #2 Karla ALCANTAR-Salazar

PEPT# PEPT240200126

02/08/2024

FACTS (CONTINUED)

On February 5, 2024, a Border Patrol Agent assigned to the Santa Teresa Border Patrol Station Anti-Smuggling Unit (ASU), was conducting surveillance near a residential area in Anthony, New Mexico. In the agents' experience, this area is used daily by alien smuggling organizations to pick up illegal aliens and further their entry into the United States given its close proximity to the international border. Border Patrol agents have developed many smuggling cases and made numerous arrests which originated from this area.

While conducting surveillance, the agent saw a tan Jeep Cherokee pass by his location that appeared to be heavily laden. The agent followed the Jeep Cherokee and after a series of turns, it became stopped at a red light. The agent pulled up behind it and could see several individuals inside the vehicle laying on top of each other in what appeared to be an attempt to conceal themselves from public view.

Believing an alien smuggling scheme was in progress, the agent continued to follow the Jeep Cherokee and after a short distance, it pulled into and parked at a fuel pump at the Flying J Travel Center near the intersection of Mountain Pass Blvd. and Interstate-10 in Anthony, TX., which is in the Western District of Texas.

The agent parked nearby and saw the driver, later identified as Lyzette Yvonne GUERRERO, DEFENDANT 1 and a passenger also later identified as Karla ALCANTAR-Salazar, DEFENDANT 2, walk into the travel center. The agent approached the Jeep Cherokee and again saw multiple individuals in the back seat and cargo area attempting to conceal themselves.

DEFENDANT 1 and DEFENDANT 2 returned to the Jeep Cherokee and the agent identified himself as a United States Border Patrol agent, informed them he was conducting an immigration investigation and questioned them as to their citizenship. It was determined that DEFENDANT 1 is a United States citizen and DEFENDANT 2 is a citizen of Mexico illegally present in the United States without any documents that would allow her to be or remain in the United States legally.

The agent then questioned the other passengers in the vehicle and determined that one male is a United States citizen, and seven other individuals are illegally present in the United States. The seven illegal aliens also admitted that they had just recently made their illegal entry into the United States. At this time, both DEFENDANT 1 and DEFENDANT 2, a male United States citizen and the seven illegal aliens were all placed under arrest and transported to the Border Patrol Station.

In a post-Miranda interview of DEFENDANT 1 (Driver), she admitted to knowing that the individuals she and DEFENDANT 2 picked up and transported are illegal aliens. DEFENDANT 1 also admitted she agreed with DEFENDANT 2 to pick up and transport illegal aliens, and in exchange she was to be paid \$100.00 for picking them up and another \$100.00 for completing the job. DEFENDANT 1 also admitted that she was hired by DEFENDANT 2 to be the driver for the alien smuggling scheme and that she was supposed to drive them to a

CONTINUATION OF CRIMINAL COMPLAINT

WESTERN DISTRICT OF TEXAS

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FACTS (CONTINUED)

Family Dollar in Las Cruces, NM.

In a post-Miranda interview of DEFENDANT 2 (Passenger), she admitted to knowing that the individuals she and DEFENDANT 1 picked up and transported are illegal aliens. DEFENDANT 2 also admitted she agreed with a known smuggler to pick up and transport illegal aliens, and in exchange she was to be paid \$600.00. DEFENDANT 2 also admitted that she hired DEFENDANT 1 for the purpose of using her vehicle for the alien smuggling scheme. DEFENDANT 2 also stated that DEFENDANT 1 knew that they were going to pick up illegal aliens and also claimed that she was going to keep \$200.00 and pay \$400.00 to DEFENDANT 1 for using her vehicle.

Because this affidavit is being submitted for the limited purpose of establishing probable cause as set forth herein, I have not included each and every fact known to me concerning this investigation.

Immigration History:

DEFENDANT #1 - NONE

DEFENDANT #2 - Citizen of MEXICO - Has been REMOVED 2 time(s), the last one being to MEXICO on November 28, 2012, through EL PASO, TX.

Criminal History:

DEFENDANT #1 - NONE

DEFENDANT #2 -

12/20/2001, HOLLYWOOD, CA, THEFT(M), CNV, FINE.

04/24/2002, LOS ANGELES, CA, GRAND THEFT - MONEY/LABOR/PROP(M), CNV, 20 DAYS JAIL.

03/20/2006, GLENDALE, CA, GRAND THEFT - FIREARM/ANIMAL/ETC(F), CNV, 120 DAYS JAIL.

07/23/2006, LOS ANGELES, CA, TAKE VEHICLE W/O OWN CONSENT(F), CNV, 16 MO JAIL.

03/31/2012, EL PASO, TX, 8 USC 1326 - ILLEGAL RE-ENTRY(F), CNV, 8 MO JAIL.